

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE  
Nashville Division

In re: Capstone Pediatrics, PLLC,  
  
Debtor.

Case No. 3:19-bk-01971

Chapter 11

Judge Randal S. Mashburn

**MOTION FOR ADMISSION *PRO HAC VICE* OF DAVID A. WENDER**

BlueCross BlueShield of Tennessee, Inc., by and through its undersigned counsel, hereby moves this Court, pursuant to Local Rule 2090-1 of the United States Bankruptcy Court for the Middle District of Tennessee, for the admission *pro hac vice* of David A. Wender, so that he may appear and participate in this case. The reasons supporting this Motion are more fully set forth in the attached Declaration of David A. Wender, which is incorporated herein by reference.

1. As established by the attached Declaration, David A. Wender is a member in good standing of all the courts to which he is admitted. Further, David A. Wender agrees to be bound by the Local Rules of this District and Orders of this Court. Laura Ketcham of the law firm of Miller & Martin PLLC will serve as co-counsel in this case. Ms. Ketcham maintains an office in the State of Tennessee at 832 Georgia Avenue, Suite 1200, Chattanooga, Tennessee 37402.

For the foregoing reasons, counsel for BlueCross BlueShield of Tennessee, Inc. respectfully requests that this Court enter an Order granting the admission *pro hac vice* of David A. Wender.

Respectfully submitted,

**MILLER & MARTIN PLLC**

By: /s/Laura F. Ketcham

Laura F. Ketcham, TN BPR No. 024543  
832 Georgia Avenue, Suite 1200  
Chattanooga, TN 37402  
Telephone (423) 756-6600  
Facsimile (423) 785-8480  
Email: laura.ketcham@millermartin.com

***Attorneys for BlueCross BlueShield of  
Tennessee, Inc.***

## CERTIFICATE OF SERVICE

I hereby certify that on this 8<sup>th</sup> day of March 2022, a copy of the foregoing Motion for Admission Pro Hac Vice of David A. Wender was filed electronically. Notice of this filing will be sent by electronic mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System. I certify that interested parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system.

David W. Houston, IV  
Emily Campbell Taube  
Burr & Forman LLP  
222 Second Avenue South  
Suite 2000  
Nashville, TN 37201

Michael Gigandet  
Law Office of Michael Gigandet  
208 Centre Street  
Pleasant View, TN 37146

Natalie M. Cox  
Megan Reed Seliber  
U.S. Dept of Justice  
Office of the U.S. Trustee  
701 Broadway, Ste 318  
Nashville, TN 37203

/s/Laura F. Ketcham